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Attorney for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSHUA LANDON KLIPP,

Defendant.

CASE NO. 2:14-CR-0107 TLN

**STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE
FROM SEPTEMBER 4, 2014, TO
OCTOBER 23, 2014**

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and
defendant, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on September 4, 2014.
2. By this stipulation, the defendant now moves to continue the status
conference until October 23, 2014, at 9:30 a.m., and to exclude time between September 4,
2014, and October 23, 2014 under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the
following:
 - a. The government has represented that the discovery associated with this case
includes a significant amount of computer evidence.

b. Counsel for both parties are unable to devote the time necessary to review of the evidence because of other duties. In particular, Defense Counsel has been unable to complete his review of the seized computer evidence in this case. Counsel believe that failure to grant the above-requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

c. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

d. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., the time period of September 4, 2014 to October 23, 2014, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), Local Code T4, because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 2, 2014

Respectfully Submitted,

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Kyle Reardon
KYLE REARDON
Assistant U.S. Attorney

Dated: September 2, 2014

/s/ Kyle Reardon for
MICHAEL AYE
Attorney for the Defendant

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JOSHUA LANDON KLIPP,

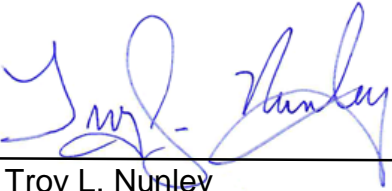
Defendant.

CASE NO. 2:14-CR-0107 TLN

**ORDER CONTINUING STATUS
CONFERENCE FROM SEPTEMBER 4,
2014, UNTIL OCTOBER 23, 2014**

The parties' stipulation is approved and so ordered. The time beginning September 4, 2014, until October 23, 2014, is excluded from the calculation of time under the Speedy Trial Act. For the reasons contained in the parties' stipulation, this exclusion is appropriate to ensure effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv); Local Code T4. The interests of justice served by granting this continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Dated: September 2, 2014



Troy L. Nunley
United States District Judge